

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of:

The Amendment of Part 97 of the
Commission's Amateur Radio
Service Rules to Reduce Interference and
Add Transparency to Digital Data

RM- 11831

To: The Chief, Wireless
Telecommunications Bureau

OPPOSITION

Pursuant to and within the time limits of the provisions of §1.45(b) of the Commission's Practice and Procedure rules, I hereby submit this formal *Opposition* to the April 10, 2019 submittal by the Board of Directors of Amateur Radio Safety Foundation, Inc. (ARSFI/Winlink), and Loring Kutchins, et. al.

With respect to responses in a Rulemaking Petition proceeding, only *Comments and Reply Comments* are permissible pleadings, according to Commission regulations. [*emphasis added*]¹

¹ See 47CFR §1.405 (c).

As a result, I hereby request that the referenced *Motion to Dismiss and Petition for Rulemaking* titled multi-purpose filing be ignored, or set aside and not acted upon since it is not in conformance with § 1.405 (c) of Commission rules. The only possible relevant *purpose* of the submittal being as *Comments of ARSFI/Winlink in the above captioned proceeding*.

Respectfully Submitted,

/s/

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April 17, 2019